

**IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

In re:

SUZANNE HELENE MARTIN

Debtor,

vs.

MOHELA

Defendant.

Case No. 14-30475-can-7  
Chapter 7

**COMPLAINT TO DISCHARGE EDUCATIONAL LOAN**

COMES NOW the Plaintiff, pursuant to 11 U.S.C. §523(a)(8) and for her complaint against American Education Service and states:

1. Jurisdiction of this matter is conferred on the Court by 28 U.S.C. §1334.

This complain constitutes a core proceeding under 28 U.S.C. §157.

2. Venue s proper in this Court under 28 U.S.C. §1409.

3. This action is brought pursuant to 11 U.S.C. §523(a)(8).

4. The Plaintiff is the debtor in the above-entitled case which was filed under Chapter 7 of the Bankruptcy Code on 7<sup>th</sup> day of August 2014.

5. The defendant, MOHELA may be served with process at 633 Spirit Drive, Chesterfield, MO 63005.

6. The defendant MOHELA holds a claim of approximately \$4,833.00 against the debtor based upon an educational loan.

7. Because of Debtor's mental disabilities, she is unable to pay this debt. The plaintiff requests the Court to find that the debt is nonetheless dischargeable in bankruptcy on the grounds that excepting such debt from discharge will impose an undue hardship on the debtor.

WHEREFORE, Debtor prays that this Court make and enter its order discharging the indebtedness held by American Educational Services for the reasons above stated.

BHEND LAW OFFICE

By: /s/ Jonathan D. Bhend

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ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing was served through the Court's ECF filing system on the same date as filing and conventionally, via first-class mail, postage prepaid, to those parties below, if any, who have requested notice but are not participating in the ECF System, on the date entered on the Court's docket.

MOHELA  
633 Spirit Drive  
Chesterfield, MO 63005

/s/ Jonathan D. Bhend

Jonathan D. Bhend